

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 17 B 19114
Bobby Gunn,)	HON. Timothy Barnes
)	CHAPTER 13
DEBTOR.)	

NOTICE OF MOTION

To: Trustee Marilyn O Marshall, 224 S. Michigan Avenue, Suite 800, Chicago, IL 60604

See attached Service List.

Please take notice that on April 26, 2018, at 9:30 a.m. I shall appear before the Honorable Judge Timothy Barnes in Courtroom 744 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached motion and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he sent this notice and the attached motion on April 4, 2018 to:

The Chapter 13 Trustee listed above via electronic notice;

To the attached service list via U.S. Mail with postage prepaid from the mail box located at 20 S. Clark Street, Chicago, IL 60603.

/s/ Roger Leshinsky
Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625

Label Matrix for local noticing

0752-1

Case 17-19114

Northern District of Illinois

Chicago

Wed Apr 4 09:57:08 CDT 2018

Americash Loans

3200 W 159th St

Harvey, IL 60428-4056

U.S. Bankruptcy Court

Eastern Division

219 S Dearborn

7th Floor

Chicago, IL 60604-1702

Apple Home Healthcare

123 W Madison St

Chicago, IL 60602-4630

AT&T

PO Box 769

Attn: Melinda I. Alonzo

Arlington, TX 76004-0769

CCI

501 Greene Street # 302

Augusta, GA 30901-4415

Cash Net USA

200 W Jackson Blvd

Fl 14

Chicago, IL 60606-6929

City of Chicago - Dep't of Revenue

PO Box 88292

Chicago, IL 60680-1292

City of Chicago Department of Finance

c/o Arnold Scott Harris

111 W Jackson Blvd Ste 600

Chicago, IL 60604-3517

(p)COMED

1919 SWIFT DR

OAKBROOK IL 60523-1502

Commonwealth Edison Company

Attn: Bankruptcy Department

1919 Swift Drive

Oakbrook Terrace, IL 60523-1502

Harris and Harris LTD

111 W Jackson Blvd

Suite 600

Chicago, IL 60604-3517

I C SYSTEMS INC

PO BOX 64378

SAINT PAUL, MN 55164-0378

IRS 1

PO Box 7346

Philadelphia, PA 19101-7346

Infusystem Inc

PO BOX 204467

Dallas, TX 75320-4467

Internal Revenue Service

PO Box 7346

Philadelphia, PA 19101-7346

Northwestern Medicine

Po Box 4090

Carol Stream, IL 60197-4090

PINNACLE CREDIT SERVIC

810 1ST ST S STE 260

HOPKINS, MN 55343-7606

PRESTIGE FINANCIAL SERVICES

PO BOX 26707

SALT LAKE CITY, UT 84126-0707

Peoples Gas

PO BOX 2968

Milwaukee, WI 53201-2968

Pinnacle Credit Services, LLC

d/b/a Verizon Wireless

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Prestige Financial Services, Inc c/o Sara Ni

1420 S. 500 W

C/O Sadie Oldham

Salt Lake City, UT 84115-5149

Angelica Harb

The Semrad Law Firm, LLC

20 S. Clark Street, 28th Floor

Chicago, IL 60603-1811

Bobby Gunn

236 Leclair Ave., Basement

Chicago, IL 60644-2523

Marilyn O Marshall

224 South Michigan Ste 800

Chicago, IL 60604-2503

Patrick S Layng

Office of the U.S. Trustee, Region 11

219 S Dearborn St

Room 873

Chicago, IL 60604-2027

Rodion Leshinsky

The Semrad Law Firm, LLC

20 S. Clark Street, 28th Floor

Chicago, IL 60603-1811

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

ComEd	End of Label Matrix	
3 Lincokln Cetre	Mailable recipients	26
c/o Sabrina Copelan	Bypassed recipients	0
Villa Park, IL 60181	Total	26

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MOTION FOR HARDSHIP DISCHARGE

NOW COME the Debtor, Bobby Gunn, by and through Debtor's attorneys, The Semrad Law Firm, LLC and hereby move this Honorable Court to enter an Order granting the Debtor a hardship discharge. Debtor states the following:

1. This motion arises under 11 U.S.C. § 1328(b).
2. On June 24, 2017, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
3. On October 26, 2017, this Honorable Court confirmed the Debtor's Chapter 13 Plan of reorganization.
4. There is a pending Motion to Dismiss the case for failure to make plan payments which will be heard on April 26, 2018.
5. Debtor's maintained an excellent pay history in the instant case for the duration of the case.
6. Debtor has paid \$1,203.02 into the Chapter 13 Plan of reorganization.
7. Debtor has passed away on January 11, 2018. Please see Exhibit A.
8. Debtor is unable to cure the plan default.
9. Debtor is unable to modify the Chapter 13 Plan under Section 1329 as there is no room in the plan to defer the plan default, and Debtor is unable to afford increased monthly plan payments.

10. Debtor used his best efforts to fund the Chapter 13 Plan.
11. Debtor's creditors have received a far greater amount than they would have received if Debtor had filed under Chapter 7 of the Bankruptcy Code.
12. Debtor's attorney, The Semrad Law Firm, LLC respectfully requests this Honorable Court to waive the requirement that Bobby Gunn file the Declaration regarding Domestic Support Obligations as well as the Certification of Completion of Instructional Course Concerning Personal Financial Management, in order for him to receive a discharge in the Chapter 13 Case.
13. Due to the reasons stated in this Motion, Debtor respectfully requests this Honorable Court enter an Order granting the Debtor a hardship discharge.

WHEREFORE, the Debtor prays this Honorable Court enter an Order granting the Debtor a hardship discharge, and for such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Roger Leshinsky
Attorney for the Debtor

The Semrad Law Firm, LLC
20 South Clark Street, 28th Floor
Chicago, Illinois 60603
(312) 913-0625